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**CORRESPONDENCE SHOULD BE
SENT TO THE WHITE PLAINS
ADDRESS ONLY**

Via CM/ECF

Honorable Philip M. Halpern, U.S.
The Hon. Charles L. Brieant Jr.
Federal Building and United States
300 Quarropas St.
White Plains, NY 10601-4150

Application granted to the extent that the Order and Stipulation regarding the remaining claims for relief and defenses shall be filed by April 19, 2024; the pretrial materials required by Rules 6(A) and 6(B) shall be filed by April 29, 2024; and opposition to any motion *in limine* shall be filed by May 13, 2024. No further extensions of these deadlines will be granted.

An order of reference to the Magistrate Judge for settlement will be docketed separately.

The Clerk of Court is respectfully directed to terminate the motion sequence pending at Doc. 166.

SO ORDERED.



Philip M. Halpern
United States District Judge

Dated: White Plains, New York
March 27, 2024

- Re: 1) Campbell v. Plant Health Intermediate, Inc.
Case No.: 19-cv-03017 (PMH) ("Action No. 1")
- 2) Plant Health Intermediate, Inc. v. Campbell, et al.
Case No.: 20-cv-07249(PMH) ("Action No. 2")
- 3) Campbell v. Douglas Products and Packaging
Company LLC
Case No.: 21-cv-07920 (PMH) ("Action No. 3")

Dear Judge Halpern:

We represent Nicole Campbell, as Seller Representative, Rupert Campbell, and Clare Reinbergen. We write jointly with counsel for Plant Health Intermediate, Inc. and Douglas Products and Packaging Company LLC, pursuant to Rule 1(C) of Your Honor's Individual Practices in Civil Cases, to request an extension of dates set forth in Your Honor's recent Opinion and Order (the "Opinion"), except for the June 17, 2024 date for a pre-trial conference.

In conjunction with the Opinion, on March 20, 2024, counsel for the parties met and conferred for approximately one hour to discuss among other things, a proposed Order and Stipulation consolidating and simplifying the remaining claims for relief and defenses now extant, and the dates set forth in the Opinion for pre-trial filings. Counsel for the parties also conferred about engaging in further discussions regarding a global settlement of all disputes between the parties, along with the method for settlement negotiations.

Following correspondence between counsel, the parties agreed that further settlement negotiations would be appropriate at this time with the assistance of Magistrate Judge McCarthy, who previously held a settlement conference in this matter following a referral from Your Honor. Counsel for the parties recognize that devoting time and resources to a global settlement of all

disputes prior to proceeding with the pre-trial filings is prudent. In addition, the parties want to ensure that a date and time that is mutually convenient for Magistrate Judge McCarthy and the parties is scheduled within the next few weeks. Based upon the foregoing, the parties seek: i) an extension of dates set forth in the Opinion in the manner set forth below; and ii) a referral to Magistrate Judge McCarthy for a further settlement conference.

As required by Rule 1(C) of Your Honor's Individual Practices in Civil Cases, counsel for the parties state as follows:

(1) Original Dates: The Opinion provides for the following dates: i) the parties are to file an Order and Stipulation consolidating and simplifying the remaining claims for relief and defenses now extant by April 5, 2024; ii) the parties are to file the documents required by Rules 6(A) and 6(B) of Your Honor's Individual Practices in Civil Cases by April 12, 2024; iii) opposition to any motions *in limine* are to be filed by April 26, 2024; and iv) a pre-trial conference is scheduled for June 17, 2024 at 12:00 pm.

(2) Reason for Request: In light of the Court's Opinion, the parties agree that further global settlement negotiations are appropriate before substantial time and resources are expended in preparing submissions in advance of trial. The parties further agree that a referral to Magistrate Judge McCarthy for such settlement negotiations would be practical as this Court previously referred the matter to Magistrate Judge McCarthy for a settlement conference.

(3) Number of Prior Requests and Result: This is the first request to extend the deadlines set forth in the Opinion.

(4) Consent: All parties consent to this request.

The parties propose the following new dates:

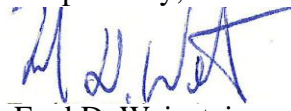
(1) The Order and Stipulation consolidating and simplifying the remaining claims for relief and defenses now extant shall be filed by April 19, 2024;

(2) Pretrial documents required by Rules 6(A) and 6(B) of Your Honor's Individual Practices in Civil Cases shall be filed by May 13, 2024; and

(3) Opposition to any motion *in limine* shall be filed by May 28, 2024.

We thank Your Honor for your time and consideration.

Respectfully,



Fred D. Weinstein

cc: Opposing counsel (via CM/ECF)